

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>Benjamin George,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No.     20-cv-06911</b>
	)	
<b>v.</b>	)	<b>Hon. Judge Blakey</b>
	)	
<b>City of Chicago,</b>	)	<b>Hon. Magistrate Judge Jantz</b>
<b>et al.,</b>	)	
	)	
<b>Defendants.</b>	)	<b>JURY TRIAL DEMANDED</b>

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**DEFENDANT JAMES GARDINER’S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant James Gardiner (“Defendant” or “Gardiner”), by and through his attorney, Thomas D. Carroll of Thomas R. Raines Attorney at Law, LLC, hereby moves for an extension of time to answer or otherwise plead to Plaintiffs’ Complaint (the “Complaint”). In support of the motion, Defendant states as follows:

1. Plaintiff, Benjamin George (“Plaintiff”) filed this action on November 20, 2021.
2. Defendant Gardiner was served with process on January 6, 2021. *See Dkt. 24.*
3. Defendant’s attorney, the undersigned, filed an appearance on behalf of Gardiner on January 26, 2021.
4. Defendant’s responsive pleading is currently due on Friday, February 19, 2021, per the Court’s order of January 13, 2021. *See Dkt. 22.*
5. Since the filing of Defendant’s appearance, his co-defendant, Charles Sikanich (“Sikanich”), was served with process on February 4, 2021. *See Dkt. 27.*
6. Defendant Sikanich’s responsive pleading is due on February 25, 2021.

7. After he was served with process, Sikanich retained Gardiner's undersigned attorney, Thomas D. Carroll, as counsel for this matter.
8. Given that defendants Gardiner and Sikanich are both privately represented by the same attorney and are likely to have defenses in common, Defendant Gardiner moves this Court for an extension of time, until February 25, 2021, to file a responsive pleading to the Complaint, which will be a single responsive pleading entered on behalf of both Gardiner and Sikanich.
9. This motion is made in the interests of judicial efficiency, with no intention or likelihood of causing undue delay.
10. Counsel for defendants Sikanich and Gardiner conferred with counsel for the Plaintiff, Daniel Massoglia, on February 17, 2021. Mr. Massoglia indicated that Plaintiff has no objection to this motion for extension of time.

WHEREFORE, the Defendant, James Gardiner, respectfully request that the Court grant this motion for extension of time to answer or otherwise plead to Plaintiff's Complaint until February 25, 2021, and for any other relief that the Court deems just.

Respectfully Submitted,  
THOMAS R. RAINES  
ATTORNEY AT LAW, LLC

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Dated: February 17, 2021

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record for the Defendant, hereby certifies that on February 17, 2021 he served a copy of the Defendant's Unopposed Motion for Extension of Time to Answer or Otherwise Plead on all counsel of record by electronic means via the Northern District of Illinois's Electronic Case Filing (ECF), system, which notifies all counsels and parties of record.

/s/ Thomas D. Carroll  
Thomas D. Carroll